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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) No. CR-12-0799 YGR  
11 )  
Plaintiff, )  
12 ) STIPULATION AND ORDER TO RESET  
vs. ) STATUS CONFERENCE DATE AND TO  
13 ) EXCLUDE TIME UNDER THE SPEEDY  
DANIEL RAMOS, ) TRIAL ACT  
14 )  
Defendant. )  
15 \_\_\_\_\_)

16 The above-captioned matter is set on May 2, 2013 for a status conference. The parties  
17 request that this Court continue the hearing to June 6, 2013 at 2:00 p.m. and that the Court  
18 exclude time under the Speedy Trial Act between May 2, 2013 and June 6, 2013.  
19

20 This is a case charging Possession of Methamphetamine for Sale; Unlawful Possession of  
a Machine Gun; Possession of a Firearm in Furtherance of a Drug Trafficking Crime; and  
21 Possession of a Machine Gun in Furtherance of a Drug Trafficking Crime. As charged, the  
22 defendant faces the possibility of mandatory minimum penalties of 45 years. The undersigned  
23 defense counsel was appointed in this matter on February 15. Since being appointed, counsel  
24 has been reviewing the discovery provided thus far, performing legal research, and performing  
25 investigation. This court granted one stipulation continuing this matter since undersigned  
26

1 counsel was appointed. The defense submitted a letter to the government last month requesting  
2 several additional categories of discovery based upon its review of the initial discovery  
3 production. The government turned over much of that new discovery in the past week, including  
4 more than 100 pages of documents. Three CDs containing additional evidence are in the mail to  
5 the defense and should arrive tomorrow. Additional time is needed to review this new  
6 discovery, meet with the defendant, and to perform necessary related investigation and legal  
7 research. The parties agree the ends of justice served by granting the continuance outweigh  
8 the best interests of the public and defendant in a speedy trial. Therefore, the parties further  
9 stipulate and request that the Court exclude time between May 2, 2013 and June 6, 2013 in  
10 accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv)  
11 for adequate preparation of counsel.

12  
13 IT IS SO STIPULATED:

14 Dated: April 30, 2013

/s/ Ned Smock  
NED SMOCK  
Assistant Federal Public Defender

15  
16  
17 Dated: April 30, 2013

/s/ Natalie Lee  
NATALIE LEE  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. CR-12-0799 YGR
	)	
Plaintiff,	)	ORDER GRANTING STIPULATED
	)	REQUEST TO RESET STATUS
v.	)	CONFERENCE DATE AND TO
	)	EXCLUDE TIME UNDER THE SPEEDY
DANIEL RAMOS	)	TRIAL ACT
	)	
Defendant.	)	
	)	
	)	

The parties jointly requested that the May 2, 2013 status conference in this matter be reset for a status conference on June 6, 2013, and that time be excluded under the Speedy Trial Act between May 2, 2013 and June 6, 2013 to allow for the effective preparation of counsel, taking into account the exercise of due diligence. The defense is obtaining and reviewing discovery. Additional time is needed for that purpose and to allow sufficient time for the defense to analyze the evidence and perform necessary investigation. Accordingly, the Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendant in a speedy trial. Good cause appearing therefor, and pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv),

**IT IS HEREBY ORDERED** that this matter is set for a status conference on June 6, 2013 at 2:00 p.m., and that time between May 2, 2013 and June 6, 2013 is excluded under the Speedy Trial Act to allow for the effective preparation of counsel, taking into account the exercise of due diligence.

DATED: May 1, 2013

  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge